



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET, Rm. 3-177  
NEW YORK, NY 10007

MICHAEL A. CARDOZO  
*Corporation Counsel*

ARTHUR G. LARKIN  
Senior Counsel  
Phone: (212) 788-1599  
Fax: (212) 788-9776  
alarkin@law.nyc.gov

June 17, 2013

**BY ECF**

Hon. Nina Gershon  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Elle Carmichael v. City of New York, 06-CV-1913 (NG) (VVP)

Your Honor:

We are filing at this time defendants' fully briefed motion for summary judgment. We respectfully request permission to file a reply brief of just under thirteen (13) pages in length rather than ten (10) pages as Your Honor's rules require. We note that our moving brief was twenty (20) pages long, five (5) pages shorter than the court's rules permit. Plaintiff's counsel does not object to this request, which we of course understand is subject to Your Honor's approval. We are aware that the court's individual rules require applications for extensions of the page limits to be filed one day prior to the date the reply is due, and we apologize to the court for not adhering to this rule. We had every expectation that our reply would be no longer than ten (10) pages, but after we had made every possible effort to edit the brief, we were unable to do so any further. We appreciate the court's indulgence of this request.

Respectfully submitted,

/s/

Arthur G. Larkin (AL 9059)  
Assistant Corporation Counsel

AGL/m

cc: All Counsel (by ECF)